

**U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Kimberly A Williams

Case No.: 18-15323

Chapter 13

Debtor.

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MOTION FOR REINSTATEMENT OF THE AUTOMATIC STAY

To the Honorable Jean K FitzSimon, Bankruptcy Judge:

Petitioner, Kimberly A Williams, through her attorney, George R. Tadross, Esq., respectfully represents:

(1) Petitioner is Kimberly A. Williams, an adult individual residing at 13 Robinhood Drive, Levittown, PA 19054 who filed a Chapter 13 Bankruptcy to save her home from Foreclosure.

(2) Respondent is Wells Fargo Bank, NA, a mortgage corporation with headquarters at 3476 Stateview Blvd, Fort Mill, SC 29715.

(3) Petitioner filed a voluntary Chapter 13 Bankruptcy petition pursuant to section 301 of Title 11, United States Code, on August 10, 2018.

(4) Subsequent to the filing, Petitioner began making payments on the plan. Further, Petitioner was paying on the plan to the amount of \$12,158.

(5) Wells Fargo Bank, NA, Mortgage Company applied for the stay to be lifted so they could proceed with the foreclosure process.

(6) The automatic stay was lifted on January 7, 2019.

(7) Approximately 6 months into their Bankruptcy Plan, SLS (Specialized Loan Servicing) mortgage company purchased Petitioner's mortgage in the instant case.

(8) While Respondent is legally entitled to proceed with the Foreclosure, such an action is not equitable to Petitioner considering that she is meeting all of her obligations under the Plan through this honorable Court.

(9) Petitioner is able to make the mortgage payments and the plan payments as she have been doing so for several months until the payments were no longer accepted by the new mortgage company

(10) The applicant and his attorney would like the automatic stay reinstated and the sheriff sale stayed until such time as Petitioner fails to meet her obligations under the Plan.

WHEREFORE, Petitioner respectfully requests that this Honorable Court reapply the Automatic Stay and allow her to continue making payments under the Plan.

Dated: May 2, 2019

/s/George R Tadross
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